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*Attorney for Defendant*

**UNITED STATES DISTRICT COURT  
 FOR THE  
 NORTHERN MARIANA ISLANDS**

<b>UNITED STATES OF AMERICA,</b>	)	<b>Criminal Case No. 07-00025</b>
	)	
	)	
<b>Plaintiff,</b>	)	<b>STIPULATED MOTION TO CONTINUE</b>
<b>vs.</b>	)	<b>SENTENCING HEARING</b>
	)	
<b>JOSEPH V. SANTOS.</b>	)	
	)	<b>Date: February 26, 2008</b>
<b>Defendant.</b>	)	<b>Time: 9:00 a.m.</b>
	)	<b>Judge: Hon. Alex R. Munson</b>

**COMES NOW**, Colin M. Thompson on behalf of the Defendant, Joseph V. Santos and Craig Moore from United States Attorney's Office on behalf of the Plaintiff, United States of America to submit this stipulated motion to continue the sentencing hearing. At the hearing on January 23, 2008, the Court ordered the United States Probation Office to conduct an accounting determine the expenditures of the defendant's funds. The investigation is ongoing. Counsel for the defendant has communicated with the United States Attorney and United States Probation Officers and both concur that additional time is necessary for the completion of investigation and reporting to the Court.

Additionally, the defendant needs more time to report to United States Probation. Accordingly, to the United States Probation, the defendant has to date, fully cooperated with them by requesting the production of records from various financial institutions in a timely manner. Accordingly, defendant seeks a continuance of the sentencing date in order to allow United States

1 Probation to complete its report and to give the defendant the necessary time to reply and report to the  
2 Court.

3 Based on the foregoing, the Parties hereby request that the sentencing hearing be continued to  
4 **April 15, 2008 at 8:30 a.m.**

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6 Respectfully submitted by:

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8  
9 Date: February 19, 2008

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/s/  
**COLIN M. THOMPSON, ESQ.**  
Attorney for Defendant

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11  
12 Date: February 19, 2008

\_\_\_\_\_  
/s/  
**CRAIG N. MOORE, ESQ.**  
Assistant United States Attorney